FILED
JUN 0 2 2008
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8485

UNITED STATES OF AMERICA Plaintiff, v. Genevieve ESCUDERO, Defendant.	Magistrate Case No.: COMPLAINT FOR VIOLATION OF 21 U.S.C. § 952 and 960 Importation of a Controlled Substance (Felony)

The undersigned complainant being duly sworn states:

COUNT ONE

That on or about May 31, 2008, within the Southern District of California, defendant Genevieve ESCUDERO did knowingly and intentionally import approximately 7.02 kilograms (15.44 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

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COUNT TWO

That on or about May 31, 2008, within the Southern District of California, defendant Genevieve ESCUDERO did knowingly and intentionally import approximately 10.86 kilograms (23.89 pounds) of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

ROSALINDA ESTRADA
Special Agent
Immigration & Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 2ND DAY OF JUNE 2008.

PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

UNITED STATES OF AMERICA
v.
Genevieve ESCUDERO

STATEMENT OF FACTS

This Statement of Facts is based on the reports, documents, and notes furnished to U.S. Immigration and Customs Enforcement Special Agent Rosalinda Estrada.

On May 31, 2008, at approximately 1832 hours, Genevieve ESCUDERO attempted to enter the United States from the Republic of Mexico through the Calexico, California, West Port of Entry. ESCUDERO was the driver and sole occupant of a 1997 BMW 385I bearing California license plate 5RSY323. ESCUDERO was also the registered owner of the vehicle.

Primary Customs and Border Protection Officer (CBPO) F. Lopez received a negative Customs declaration from ESCUDERO. ESCUDERO stated she had gone to Mexicali to see the doctor. Upon inspecting the vehicle, CBPO F. Lopez noticed the driver side rocker panel of the vehicle had been recently painted. CBPO F. LOPEZ then requested CBP Canine Enforcement Officer (CEO) J. Jones utilize his Human Narcotics Detector Dog (HNDD) on the vehicle. CEO J. Jones's HNDD alerted to the front passenger side rocker panel of the vehicle.

Upon further inspection of the vehicle in secondary, CBPO Pelayo received high buster readings in the rocker panels, and noticed that the screws holding the carpet had been tampered with. Upon removing the screws and carpet, an access plate was discovered on both driver and passenger side rocker panels. CBPO Pelayo discovered a total of 22 packages wrapped in clear cellophane tape and black electric tape, concealed inside the rocker panels of the vehicle. Ten (10) packages contained a white powdery substance, which field-tested positive for cocaine. Twelve packages (12) contained crystallized rocks that field-tested positive for methamphetamine. A total of 7.02 kilograms (15.44 pounds) of cocaine and 10.86 kilograms (23.89 pounds) of methamphetamine were found concealed in the rocker panels of the vehicle.

ESCUDERO was notified of her arrest and advised of her Miranda Rights, which she acknowledged and waived. ESCUDERO admitted knowledge of the drugs in her vehicle and stated that she was not being paid but has been supported by the individual who put the drugs in her car for the past three years.